

1001 WATER STREET, STE. A-100 KERRVILLE, TX 78028 TEL 830.896.5200 FAX 830.896.5202

January 29, 2016

Filed Electronically Via ECFS

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

RE: EB Docket No. 06-36, Annual 47 C.F.R. § 64.2009(e) CPNI Certification Filing for Sierra Communications, Inc.

Dear Ms. Dortch:

Enclosed is the CPNI Compliance Certificate of Sierra Communications, Inc. (499 Filer ID No. 820594) for 2015 along with the accompanying Statement of Compliance and Procedures.

Please contact me at 830-895-7226 or sgatto@gvnw.com with any questions or concerns.

Sincerely,

Steve Gatto

Authorized Representative for Sierra Communications, Inc.

cc: Best Copy and Printing, Inc. (BCPI), fcc@bcpiweb.com

## Annual 47 C.F.R. § 64.2009(e) CPNI Certification

## EB Docket 06-36

Annual Section 64.2009(c) CPNI Certification for 2015

1. Date filed: January 29, 2016

2. Name of Company: Sierra Communications, Inc.

Form 499 Filer ID: 820594

4. Name of signatory: Paul J. Briesh, Jr.

Title of signatory: Vice President & General Manager

Certification:

I, Paul J. Bricsh, Jr., certify that I am an officer of the Company named above, and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules (See attached Statement of Compliance).

The Company has not taken any actions (i.e., proceedings instituted or petitions filed by the Company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. The Company does not have any information that pretexters have attempted to gain access to CPNI.

The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI. Further, there has been no unauthorized access, disclosure to unauthorized individuals, or instances of improper access to online information by individuals not authorized to view CPNI during the past year.

The Company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The Company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed

Paul J. Briesh, Jr., Vice President & General Manager

Attachment: Statement of CPNI Compliance and Procedures

## SIERRA COMMUNICATIONS, INC. STATEMENT OF COMPLIANCE and PROCEDURES

For The Year Ending 2015 Form 499 Filer ID: 820594

- 1. This Statement of Compliance for Sierra Communications, Inc. ("Sierra Communications" or "the Company") is attached to and referenced within the Company's 2015 Annual CPNI Certification.
- Sierra Communications has conducted CPNI training for all of its employees with special emphasis
  training for any employee that has access to CPNI. All employees have acknowledged their
  understanding of the requirements for the safeguarding of CPNI and the disciplinary actions that
  will be taken for the unauthorized access, breach, release, or usage of CPNI.
- The Company has and maintains copies of the FCC's CPNI Rules in addition to its own internal CPNI Policies and Guidelines (CPNI Manual). The CPNI Manual is fully compliant with FCC CPNI rules and must be reviewed and acknowledged by all Company employees.
- 4. For the year ending 2015, Sierra Communications is not aware of any incidence involving the access, breach, release, or usage of its CPNI by any unauthorized person or entity; *i.e.*, data brokers or pretexters.
- 5. For the year ending 2015, Sierra Communications has not received any customer complaints concerning the unauthorized access, breach, release, or usage of CPNI.